

MA TRANSPORTATION AD-HOC SUBCOMMITTEE
Issues and Proposed Solutions
Minutes/Recommendations from October 1, 2003 Meeting

Members Present via Conference Call:

Bob Macaux, Florence County
Liz Green, Dane County
Barb Spaude, Outagamie
Joyce Decker, Winnebago
Sue Torum, Jefferson County
Joanne Simpson, DHFS
Eileen McRae, DHFS
Bernadette Connolly, DHFS

Members Absent

Deb Rathermel, Fond du Lac
Tammy Pinno, Fond du Lac

1. The Workgroup discussed the items in the attached table, and notes are next to each item for October 1.
2. Bob Macaux announced that the meeting minutes went to all directors. The WCHSA monthly meeting is scheduled for October 4th. Bob said that at the September WHCSA meeting he provided a copy of the administrative rule pertaining to transportation and the MA handbook.
3. The ESPAC discussed transportation at the July meeting. There were no negative comments from ESPAC at that time.
4. This workgroup discussed the administrative rule. Eileen McRae from DHFS announced that comments were due to her by Monday October 6th.
5. The workgroup first discussed prior authorization. See the attached table, Item #1, for the workgroup's recommendation on prior authorization.
6. The workgroup then discussed the issue of paying for attendants (this issue was new and is not documented in the attached table). The current MA handbook states that "If the client is age 16 years or older, the need for an attendant must be determined and documented in writing by a physician, physician assistant, nurse midwife, or nurse practitioner." The workgroup discussed two alternatives to this language:
 - First, it was suggested that the requirement for documentation be eliminated entirely. One advantage to eliminating the documentation requirement are that it would help to reduce workload. However, the workgroup agreed that the documentation is usually needed once, so the reduction in workload would not be large. Also, the Department indicated that there would be a concern about costs and there would be a need

to show that we would not end up spending more on attendant costs. Further, if left up to the agency, there may be instances when the attendant is needed but is not provided -- the documentation helps ensure that the service is provided when it is needed.

- **As an alternative, the workgroup discussed raising the age from 16 to 18. This would help ensure that for all minors and attendant is provided. This also could reduce the workload slightly. The workgroup agreed that this was a recommendation they would like to put forward.**

7. The workgroup also discussed the definition of attendant. The Department agreed that the attendant is the person needed to assist the client and is not the driver of the vehicle.
8. The workgroup also discussed reimbursement of salary for the attendant. The MA handbook currently states that, "When the attendant is a member of the client's family, limit reimbursable costs to transportation, commercial lodging, and meals." **However, the definition of a family member does not include "sibling". Eileen indicated that this was an inadvertent error and the Department will fix the definition in the next handbook release.**
9. The Department also indicated that they are looking at whether salary can be provided for a family member who is not financially responsible for the client. This is a longer term discussion, however.
10. Finally the workgroup also discussed second attendants. It was agreed that the group would not recommend waiving the requirement for documentation for the second attendant.
11. The workgroup will take its recommendations to the IMAC committee on October 16th. The recommendations include:
 - A. Prior Authorization. Recommendation is to specify that if the client is taking his/her own vehicle or a city bus, prior authorization is not needed. If the client wishes to take a taxi or form of transportation other than his/her own vehicle or city bus, prior authorization is needed. As always, the county needs to be able to document that the trip took place for an MA covered service.
 - B. Attendants. Recommendation is to require documentation for people age 18 and over. (see discussion above).
 - C. Refer two items to the IMAC workload and finance subcommittee. These are possibilities for centralizing transportation services, and funding for administration of transportation services.
 - D. The work of the MA transportation ad hoc committee is finished. Keep the contacts for the workgroup as future transportation issues arise.
12. In addition, DHFS will make the following handbook changes:
 - A. Family members who are attendants – the definition should include "sibling".
 - B. The handbook currently states, "Reimburse multiple nights stays at state rates...". This will be changed to "Reimburse multiple night stays at no greater than state rates."
 - C. Reimbursement for charitable organizations, such as Ronald McDonald House (this will take a while to be changed due to the need to obtain clarification from Legal Counsel). We will provide general guidelines as described in the attached table, Item #5
 - D. The handbook will recommend that agencies should have a written policy about deadlines for submitting mileage claims.

| Issue | Proposal | Pros | Cons | Comments |
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| 1. Workload | Propose to eliminate prior authorization for transportation services | Reduces workload for agencies | Increase in appeals and shift of workload to state; Loss of ability to determine if client is taking the least expensive form of transportation (city bus vs. taxi) | OK to do 3 to 6 month approvals for a particular purpose e.g. pregnancy. |
| | JULY 9, 2003 MEETING: Proposal to specify that if the client is taking his/her own vehicle or a city bus, prior authorization is not needed. If the client wishes to take a taxi or form of transportation other than his/her own vehicle or city bus, prior authorization is needed. As always, the county needs to be able to document that the trip took place for an MA covered service | Reduces workload for agencies From 9/3/03: Bob Macaux reported that the general consensus at the ESPAC is that this recommendation will reduce workload. Dane County indicated that there would be a lesser reduction in workload for them because there is a lot of taxi cab usage in the county, but it does not increase it either. | Addresses the need to ensure that the client is taking the least expensive form of available transportation | <u>From 7/9/03 Meeting: The Workgroup agreed to forward this proposal to IMAC and DHFS management.</u> This may require an administrative rule change. 9/3/03 – Eileen McRae will research whether an admin rule change is necessary. In terms of documenting that a trip took place, there are various ways to do this. For example, some counties have a form the client takes to the provider for signature. |

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| 2. Workload | Verify mileage through claims system | Reduces agency workload | a. Reimbursement delayed when claim is not submitted timely. This will increase calls and workload. If in managed care, we don't get those claims and again an increase in work for the state. | JULY 9, 2003 WORKGROUP MEETING: The Workgroup decided that the MA Handbook currently gives them the authority to deny claims for unreasonable mileage. This is not an issue that we need a recommendation on. Therefore, no recommendation will be forwarded to IMAC or DHFS managers on this item. |

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| 3. Workload and adequacy of admin fee for counties. | <p>Centralize the system – transportation broker option. So, authorization, verification and reimbursement would be provided centrally.</p> <p><u>FROM 10/1/03 MEETING:</u> Recommendation is to refer this item to the IMAC's Workload and Financing Subcommittee</p> | <p>a. Transportation for MA takes the burden off volunteer vans which are then freed up to serve other people/demands for rides.</p> <p>b. Reduces workload for local and state.</p> <p>c. Could decrease client confusion because they only have to call one number</p> | <p>a. Transportation for MA takes the burden off volunteer vans which are then freed up to serve other people/demands for rides. If taken from county, this control is taken away too.</p> <p>b. Concern that providers will no longer work cooperatively with the county</p> <p><u>From July 9, 2003 Meeting:</u> The biggest con is the fear that people will be lost in the shuffle if they are not working with someone locally.</p> <p><u>From 9/3/03 Meeting:</u> --How do you deal with a person who cannot wait for reimbursement (particularly in cases where an overnight stay may be required)? -- Another concern is that a centralized broker would not know about all the local resources available and the workload savings would be lessened.</p> | <p>Concern raised about family care counties. It is a risk-based system and transportation is part of the benefit package —providers at risk if they don't ensure it is provided.</p> <p>Also, need to be careful about what the authorization process might look like.</p> <p><u>FROM JULY 9, 2003 MEETING:</u> Prior Authorization is the biggest workload issue. The need for a centralized system is lessened if the prior authorization issue is addressed. However, agencies are open to looking at new ways of doing business.</p> <p>If a centralization proposal is considered by DHFS, the Workgroup would like to be involved in this effort.</p> <p>The workgroup identified the need to think about the impact on transportation providers getting reimbursed timely under a centralized system.</p> <p><u>From 9/3/03 Meeting:</u> The ESPAC met on July 17th and indicated that they would be willing to work on a proposal to centralize MA transportation.</p> |

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| 4. Workload | SSI Recipients – budget proposal for HMO providers – include transportation in services | a. This would be a significant workload saving for local agencies. | Same as #3 above but smaller population. May be confusing for client in families where one person is on SSI and the other on MA | <p>Workgroup re: SSI in managed care provision in budget. This item can be discussed with the SSI workgroup</p> <p><u>From 9/3/03 Meeting:</u> Joanne Simpson agreed to follow up to find out when this issue might come up in the context of the larger proposal for HMO providers for SSI recipients. Joanne also agreed to clarify if the provision applies only to SSI recipients or all EBD Medicaid.</p> <p><u>From 10/1/03 Meeting:</u> Joanne spoke with the Department lead for this. She will be notified of any discussions of transportation for SSI recipients under managed care and she will then contact the members of the workgroup. Also, this would apply to SSI only.</p> |

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| 5. Inconsistent Policy and Workload – | Statewide guidance on who is eligible for transportation services. | Everyone on MA is eligible for transportation with two exceptions. The exceptions are for Ambulance and SMV. | | <p>DHFS will clarify in the next MA handbook</p> <p><u>From 9/3/03 Meeting:</u> DHFS asked if there were any outstanding issues on this topic. There was discussion and a question about whether a fee paid for an overnight stay at a Ronald McDonald House is reimbursable. The concern is that the charitable organization often calls this fee a “donation”. The Call Center has told agencies that this is not allowable. Eileen McRae is checking with the Department’s Legal Counsel. A clarification will be provided in an upcoming MA Handbook change.</p> <p><u>From 10/1/03 Meeting:</u> Eileen McRae will need to obtain a formal opinion from Legal Counsel before modifying the handbook. Informally, agencies will need to establish what a typical payment for the lodging would be, and Medicaid would pay no more than the typical payment.</p> |

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| 6. Inconsistent Policy – | Issue on meal reimbursement. Attachment was provided prior to the July 9 th meeting, plus current handbook. | | | <p>DHFS proposes either the State rate or County rate. The agency can choose and should adopt a written policy.</p> <p><u>From 9/3/03 Meeting:</u> The committee reviewed the current MA Handbook language which states that the agency can pay ‘no greater than the amounts paid by the state to its employees for those expenses’. Agencies on the committee indicated they liked the flexibility. DHFS suggested that it is good business practice to put in writing what the agency’s rates are. The agencies indicated they would like more guidance on what points they have flexibility on. This will be discussed at a future meeting.</p> <p><u>From 10/1/03 Meeting:</u> DHFS will work on an informational memo. DHFS will modify the MA Handbook to state that for multiple nights, pay “no more than” the state rates (it currently says to pay the state rates and that is causing some confusion).</p> |
| 7. Inconsistent Policy. | Statewide guidelines needed to clarify who, what where why when how. Does 5 and 6 take care of these issues? See new MA release in MA handbook | | | <p>May be beneficial to some counties but others may want more flexibility; Concern about what rules allow us to do. Smaller county concern.</p> <p><u>From 10/1/03 Meeting:</u> This item is not necessary – has been covered in other discussion items.</p> |

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| 8. Adequacy of Reimburse ment fee for counties | DHFS has requested a small increase for common carrier administrative expenses <u>From 10/1/03 Meeting:</u> It is recommended that this item be referred to the IMAC's Workload and Finance Committee. | | | The Legislature has removed this provision. |

Other items/comments:

1. We should consider bringing in MA providers – what guidelines do they need and how do they view any of the options? **From 10/1/03 – None of the recommendations seem to affect providers.**
2. The number of providers did not seem to be a major issue. Bigger transportation issues centered on getting to work, or getting discharged from the hospital on a Sunday.
3. A separate issue has arisen. Do the local agencies feel they need guidelines on a deadline to submit mileage records? One county has a client that has recently submitted bills that are 2-3 years old. We would like to allow flexibility, but it might be good to have a specific timeframe. **From 10/1/03 Meeting: DHFS will change the handbook to recommend that agencies have a policy about this.**
4. We should e-mail the IM agency directors to announce the ad hoc committee to ensure we have adequate representation and to communicate that we want input as well as representation from local agencies. UPDATE – A REQUEST FOR INPUT WAS PUT FORTH IN ADMINISTRATOR'S MEMO ON IMAC.

From 9/3/03 Meeting:

Second Attendant Rules: There was a question about the admin rules related to second attendants. DHFS indicated that the state is considering modifying the current admin rule language. Agencies on the committee suggested that they would like to allow flexibility for an agency to make the determination regarding a second attendant. Larger counties, however, said this would be problematic as their workers cannot know their cases as well as workers in a smaller county might. **DHFS indicated that any recommendations on this should be forwarded to Eileen McRae by the end of September.**

SMVs: Eileen also indicated that they are looking specifically at rule changes related to Specialized Medical Vehicles.